

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. 02-8

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Investigation by the Department of Telecommunications and Energy)
on its own motion, pursuant to G.L. c. 159, §§ 12 and 16,)
into the collocation security policies of Verizon New England, Inc.) D.T.E. 02-8
d/b/a Verizon Massachusetts)

Id. On its face, then, the goal of the Department’s inquiry is geared toward protecting the Commonwealth’s telecommunications infrastructure against enemy combatants and those with criminal intent. This is a laudable goal, and the Department should be commended for wanting to take steps to secure the Commonwealth’s telecommunications infrastructure. For the reasons discussed below, however, WorldCom, Inc. (“WorldCom”) urges the Department not to propose or adopt changes to its existing collocation rules.

In response to the Department's directive to file a "collocation security report and proposal"¹ consistent with the Department's goals, Verizon instead filed a blatantly anticompetitive proposal designed to reduce or eliminate CLEC access to collocated equipment, and to have CLECs pay for the privilege of having control over their own equipment taken away from them. As support for its proposal, Verizon offers the "logic" that if "foot traffic" in a central office is reduced by keeping CLEC technicians away from Verizon equipment, or out of the building altogether, there will be a concomitant reduction in intentional and/or unintentional conduct that adversely affects Verizon's network. Yet Verizon's claim is belied by the fact that it cannot point to a single instance in which a CLEC technician caused a Verizon network outage in Massachusetts (and this despite several years in which dozens of CLECs have had access to hundreds of collocation arrangements in Massachusetts). Critically, Verizon provides no data whatsoever to support the claim that telecommunications equipment housed within its central offices will be more adequately protected in the event its proposals are implemented. Moreover, Verizon's proposals are at core based on the erroneous belief that CLEC technicians sent to Verizon central offices to work on highly sophisticated and expensive telecommunications equipment either intend to cause harm or are incompetent. And much of what Verizon has proposed is inconsistent with current federal law and regulations and is beyond the Department's authority to implement in any event.

In earlier comments filed on a motion to suspend this proceeding, WorldCom argued that setting policies on issues of national importance in a state-specific forum could potentially do more harm than good. WorldCom still believes that to be true, and there has been

¹ D.T.E. 02-8, *Hearing Officer Memorandum*, at 2 (February 27, 2002).

no evidence presented in this case to suggest that the current *policies* related to collocation render the telecommunications infrastructure at undue risk. The evidence *does* show that Verizon's current security *procedures* are either outdated (*e.g.*, the continued use of keys to access central offices rather than identification badges with computerized tracking systems), poorly administered (*e.g.*, the number of access cards issued to CLECs in Massachusetts "is not readily available"), or inconsistent with its assertions in this case (*e.g.*, Verizon has recommended that the four central offices with E911 tandem switches be classified as "critical," and yet Verizon has not conducted risk assessments of the sites or otherwise enhanced security at these sites after September 11th, 2001).

Under the law as it stands today, CLECs have the right to collocate in Verizon's central offices and to access their collocated equipment, and Verizon has the right to take reasonable measures to protect its property from harm. To ensure the integrity of the telecommunications infrastructure, the solution is not, as Verizon would have it, to change the law so that Verizon can rid its central offices of CLEC personnel that have a legitimate purpose in being there. Rather, the solution is to ensure that the security measures put in place pursuant to (and consistent with) the law are adequate and are adequately followed. To that end, WorldCom respectfully submits that the Department should: (1) reject Verizon's proposals as both unnecessary and anticompetitive; (2) decline Verizon's invitation to change existing collocation policies in Massachusetts, and similarly decline to seek changes to the current collocation rules promulgated by the Federal Communications Commission pursuant to the Telecommunications Act of 1996, and; (3) monitor Verizon's ongoing efforts to bring its current security measures more up-to-date.

II. Physical collocation is of critical importance to WorldCom

The importance of physical collocation to WorldCom's business cannot be overstated. Like other CLECs, WorldCom utilizes equipment collocated in incumbent LEC central offices "to gain access to the ILEC network [and] to bring the benefits of competition, innovation and the deployment of new technologies to consumers of local telecommunications services." Exh. WCOM-1 (Lathrop Reb.) at 8. Physical collocation in particular is critical because it "permits CLECs to have physical access to the equipment and thus control over installation, the ability to perform upgrades, maintenance and repair of the equipment." *Id.* at 9.

Physical collocation is important not merely because it allows a CLEC to have more control over its own equipment, but because in exercising control over its equipment, it necessarily means that CLECs are less dependent on the incumbent:

Without physical access to its equipment, WorldCom must rely on Verizon, a competitor, to maintain and repair the equipment used to serve WorldCom customers. In addition, if WorldCom needs to augment the equipment in a virtual collocation, it must rely on Verizon to install the equipment; any delay in installation time results in delays in service provisioning and delays in new revenue. . . . Moreover, with physical access to the equipment, WorldCom is able to offer service level agreements ("SLAs") that guarantee customers specific service availability and performance. Because the SLAs include "penalties" that compensate customers if WorldCom does not meet specific service levels, it is imperative for WorldCom to have physical access to its equipment and operational control over its services.

If WorldCom is prohibited from obtaining physical collocation in Verizon premises, or required to convert physical collocation arrangements to virtual collocation arrangements, the quality of service it can guarantee would be diminished with the loss of operational control of the equipment.

Exh. WCOM-1 (Lathrop Reb.) at 9-10.² Indeed, virtually every intervenor in this proceeding except Verizon stressed the importance of and overwhelming preference for physical collocation over virtual collocation, notwithstanding the fact that physical collocation is a much more expensive alternative:

?? *Allegiance*: witness Wendy Perrott on Allegiance's experience with virtual collocation throughout Verizon's footprint: "Because of the bad experiences Allegiance[] has had with virtual collocation, we have made a company decision not to collocate virtually in Massachusetts." Tr. 416. "Allegiance has had bad experience with virtual collocation in every state in which we are collocated." Tr. 429.

?? *AT&T*: witness Christopher Nurse on the ability of a physically collocated competitor to offer customers a better mean time to repair than can Verizon: "We can do that by prioritizing that customer's circuit, by hopping a little faster in order to get the customer, as the competitor.

If we are converted to virtual, I cannot assure my customer any better service than Verizon gives on average, and to a particular customer -- that's my customers as a class. To a particular customer, I cannot assure him really of anything. I may be giving the customer two-hour service. As far as he's concerned, he doesn't care what I do with the rest of my customers. Verizon could theoretically single him out, give him his circuits ten-hour mean time to repair, as long as they met their average over all the CLECs over the state over the course of the month. It's a substantial detriment and degradation of our service quality if we don't control the maintenance." Tr. 445-446.

?? *Covad*: witness Michael Clancy on Covad's conversion of virtually collocated equipment to cageless or SCOPE: "Based on our experience with trying to maintain those collocation arrangements, trying to maintain our service-level agreements, commitments to our customers, our end users, we decided that it did not work operationally. Although it's technically feasible, it's not operationally feasible to continue virtual collocation arrangements." Tr. 559.

?? *Sprint*: witness Edward Fox on the impact to Sprint's business if certain central offices were deemed "critical": "Probably the most important thing that we have as a competitive advantage is our ability to perform fast and reliable service. . . . If we realized over a period of time that we couldn't do that, then we would have to make the

² With virtual collocation, a CLEC must not only rely on an employee of a direct competitor to do the required work on the CLEC's equipment, but the CLEC must pay for Verizon's technician to learn how to use it. See DTE MA No. 17, Part E, §3.5.12.A. ("the CLEC is responsible for all charges incurred by the Telephone Company in association with technician training").

decision whether or not we'd want to do business in Massachusetts, at least in those markets. If service were substandard to what we thought we should provide, we'd probably not do it. It would be an option.” Tr. 526.

Verizon attempted to dismiss CLEC concerns at the hearing by characterizing its proposal simply as “a change” and that “people don't like change.” Tr. 64 (Mattera). Putting aside the obvious irony of that statement coming from a representative of a once and would-be monopolist, it is fair to say that CLECs and their customers do not like changes *for the worse*, which is what Verizon's proposal is.

III. Verizon's proposals are anticompetitive and violate federal law

As described in its panel testimony, Verizon's proposed security measures are as follows:

- (1) the establishment of separate space with separate entrances and/or pathways for all forms of physical collocation (*i.e.*, caged and cageless) to secure and segregate collocators' equipment from Verizon MA's equipment and no commingling of collocators' equipment in the same rooms as Verizon MA's equipment without some reasonable means of physical separation (*e.g.*, partitioning) and secured access;
- (2) the relocation of existing *unsecured* cageless collocation arrangements to a secured and segregated area of the CO or the conversion of such arrangements to virtual collocation where secured CO space is unavailable;
- (3) the provision of reasonable access to shared facilities (*e.g.*, temporary staging areas, elevators, loading docks, restrooms, etc.) that are located outside the secured and segregated collocators' space either by partitioning Verizon MA's equipment, if feasible, or through the use of escorts at the collocated carrier's expense;
- (4) the requirement to provide virtual collocation and/or escorts at physically collocated remote terminal (“RT”) sites, and;
- (5) the development of more stringent measures in critical, “high” security risk COs, *i.e.*, classify such COs as “virtual collocation only” sites.

Exh. VZ-1 (Verizon Panel Dir.) at 4. Verizon also seeks to shift all the costs for implementing its proposals to CLECs. Exh. VZ-1 (Verizon Panel Dir.) at 41-42.

Verizon claims that the first four proposals “are for the most part already in place and followed today in Massachusetts.” Exh. VZ-2 (Verizon Panel Surreb.) at 7. Each is nevertheless anticompetitive in some respect. *See* Exh. WCOM-1 (Lathrop Reb.) at 15-24. WorldCom will briefly discuss Verizon’s first, third and fifth proposals herein.

With respect to Verizon’s first proposal, WorldCom is not *per se* opposed to separating its equipment from that of Verizon and other carriers by partitioning. Verizon’s proposal, however, fails to account for the “specific requirements on ILECs wishing to require segregated space and separate entrances” established by the FCC. Exh. WCOM-1 (Lathrop Reb.) at 15-17, citing 47 C.F.R. §51.323(i)(4) (listing requirements to be met when “[r]estricting physical collocation to space separated from space housing the incumbent LEC's equipment”); 47 C.F.R. §51.323(i)(6) (listing requirements to be met when “[c]onstructing or requiring the construction of a separate entrance to access physical collocation space”). As the FCC has stated, incumbent LECs “have incentives to overstate security concerns so as to limit physical collocation arrangements and discourage competition.”³ The FCC’s rules were designed to counterbalance those incentives, and they must continue to be adhered to.

Verizon’s third proposal is to provide “reasonable access to shared facilities” (such as temporary staging areas, elevators, loading docks, restrooms, etc.) located outside collocators’ segregated space, either by partitioning Verizon’s equipment, if feasible, or through

³ *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, Fourth Report and Order, CC Docket No. 98-147, FCC 01-204, Released August 8, 2001 (“*Fourth Report and Order*”).

the use of escorts at the collocated carrier's expense. This proposal is anticompetitive because it would likely impose significant costs on collocators:

The costs associated with this proposal would include the "engineer, furnish and installed" costs of partitioning, and could include moving equipment and possible modifications to the entire laundry list of central office infrastructure (lighting, power, heating, ventilating and air conditioning, cable racking, etc.) to accommodate the changes. While Verizon's proposal only mentions adding partitioning, the fact that Verizon proposes to bear no costs means that Verizon has no incentive to minimize the cost of any of its proposals. Certainly, Verizon's proposal lacks any specific information that instills confidence that collocators will "pay only for the least expensive, effective security option that is viable for the physical collocation space assigned" as required by federal regulations.

Exh. WCOM-1 (Lathrop Reb.) at 19-20, quoting 47 CFR §51.323(i).

Verizon's alternative, in cases where partitioning is not feasible, is to provide escorts at the collocators' expense. This is clearly in violation of the FCC's rules, which permit collocators access to their equipment "24 hours a day, seven days a week, without requiring either a security escort of any kind or delaying a competitor's employees' entry into the incumbent LEC premises by requiring, for example, an incumbent LEC employee to be present." The FCC stated "If competitors do not have such access, they will be unable to service and maintain equipment or respond to customer outages in a timely manner." *Advanced Services Order* at ¶49.⁴

Verizon's fifth proposal is to render certain "critical" central offices completely unavailable for physical collocation, whether or not there are space limitations. Competitors

⁴ *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, First Report and Order and Further Notice of Proposed Rulemaking, FCC 99-48, Released March 31, 1999 ("Advanced Services Order").

wishing to collocate in these “critical” central offices would be required to accept virtual collocation only. While claiming that it has not identified which central offices it would consider “critical,” Verizon has identified a number of factors that it would consider in making such a designation. These include:

(1) the type of switch or signaling elements housed in a CO; (2) the presence of critical customers (*e.g.*, major airport, military installation, government agencies, and/or nuclear power plant) served by a CO; and (3) the number of access lines and special services circuits served by a CO. For example, a CO may be more critical if it houses a tandem switch, an E911 tandem switch, and/or STP equipment that are the “lifeline” to numerous subtending switches throughout Massachusetts.

Exh. VZ-1 (Verizon Panel Dir.) at 39. Implementing this proposal would deal a deathblow to facilities-based competition in Massachusetts. Despite Verizon’s bobbing and weaving when it came to listing precisely which central offices it would consider “critical,”⁵ the suggested criteria themselves – and particularly one concerning “the number of access lines and special services circuits served by” a central office – reveal that the proposal, if implemented, would wipe out physical collocation in the very areas where it is most critical for CLECs. Indeed, the four downtown Boston central offices that comprise the metro zone (Back Bay, Bowdoin Street, Franklin Street and Harrison Avenue) would surely be considered “critical” under almost any conceivable definition of the term: public health and safety organizations and institutions, state and local government facilities, educational facilities, financial institutions, large and small businesses and thousands upon thousands of residential customers are served out of these four central offices. Not surprisingly, with respect to the presence of collocated competitors, they also have among the highest number of “CLECs in service” statewide (27, 32, 25, and 31,

respectively). Exh. AL-VZ-1-1. Many of the enterprise and residential customers served out of these central offices are the customers of the CLECs collocated within these central offices, who lease Verizon's loop facilities (*e.g.*, as UNE-loops or via special access) to gain access to their customers. Eliminating physical collocation would, for all intents and purposes, eliminate competition because CLECs providing service would no longer be able to differentiate themselves from Verizon with respect to the timeliness and quality of service they provide.

IV. Verizon has presented no credible evidence to support its proposals

Verizon cites the FCC's *Local Competition Order* at paragraph 203 in stating that "security and network reliability issues are valid factors to consider in determining whether physical collocation is technically feasible." Exh. VZ-1 (Verizon Panel Dir.) at 11. What Verizon conveniently omits, however, is the extremely high burden of proof an incumbent LEC faces in the event it cites "security" as a reason for refusing to allow a competitor to physically collocate:

Thus, with regard to network reliability and security, to justify a refusal to provide interconnection or access at a point requested by another carrier, incumbent LECs must prove to the state commission, with ***clear and convincing evidence, that specific and significant adverse impacts would result*** from the requested interconnection or access.

Local Competition Order at ¶203 (emphasis added). While the FCC has set the bar extremely high, Verizon has provided no competent evidence remotely suggesting that it has met that burden. Rather than a list of "specific and significant adverse impacts" that "would result" from collocation in so-called "critical" central offices, Verizon has offered only the most strained

⁵ See, *e.g.*, Tr. 83-87; 127; 154-55; 162-63; 230-33.

speculation for locking out CLEC technicians. For instance, with respect to the central offices housing E911 tandem switches, Verizon's witnesses surmised that "damage to the battery strings, that would cause an outage of power" *could* result from the presence of CLEC technicians accessing segregated CLEC equipment. For good measure, and without further explanation, they also threw in "fire" and "water damage" as possible CLEC-caused problems that may occur in those offices so long as physical collocation is permitted. Tr. 165.⁶

Of course, Verizon's parade of horrors contrasts sharply with its actual experience. Verizon in fact points out that, despite having had years' worth of experience with dozens of collocators in over 160 central offices, there have been no "egregious and harmful security violations" in Massachusetts. Exh. VZ-1 (Verizon Panel Dir.) at 21. Moreover, despite the fact that risk assessments are "most definitely" an important part of the process that should lead to the adoption of security measures (Tr. 24 (Craft)), Verizon did not rely on any risk assessments in creating its proposal to the Department (Tr. 198 (Mattera, Reney)). Despite the fact that security measures should not involve costs that are disproportionate to the risks that have been identified for a facility (Tr. 24 (Craft)), Verizon "has not determined the costs associated with its proposed collocation security plan" (Exh. VZ-1 (Verizon Panel Dir.) at 41

⁶ Verizon's proposal as it relates to "critical" E911 facilities is all the more disingenuous when one considers that, despite Verizon's fretting in this proceeding about the fate of these central offices, Verizon has not performed any risk assessments on them (RR-AL-VZ 1), nor has Verizon even seen fit to station security guards at these facilities. Tr. 149-150; *compare* Exh. AL-VZ-3-5 with Exh. AL-VZ-1-4. This is not to say that WorldCom believes that central offices housing E911 tandems, as components of the telecommunications infrastructure, are not "critical" as that term is generally understood. Nor is it to suggest that a security guard is or is not necessary at any of these facilities. The point is that Verizon is using this proceeding as an opportunity to gain a competitive advantage over its competitors under the guise of security. Verizon has identified E911 facilities as among the type it considers "critical" in a proceeding in which it hopes to remove physically collocated competitors from "critical" facilities. At the same time, there is nothing in the record to suggest that Verizon actually treats these facilities any differently today than it did on September 10th, 2001. Indeed, Verizon's opportunism in Massachusetts is underscored by the fact that it has not pursued similar relief in other jurisdictions, notwithstanding the fact that the security concerns in Massachusetts exist throughout Verizon's footprint. *See* Tr. 117-25.

(footnote omitted)). And despite the fact that Verizon's purported goal is to "prevent damage to the critical telecommunications infrastructure that can occur either accidentally or intentionally when carriers have access to COs in a physically collocated environment" (Exh. VZ-1 (Verizon Panel Dir.) at 3), Verizon can point to no instance in which a CLEC technician in Massachusetts caused an outage for customers on Verizon's network (Tr. 585-86; RR-DTE-VZ-3).

Even if there had been network affecting outages caused by CLEC technicians, that would not, in and of itself, provide the requisite justification for banning CLEC personnel altogether. Rather, to understand the nature and extent of CLEC-caused outages or security breaches, they must be put into context. An obvious way to do that would be to compare CLEC-caused outages and security breaches in central offices to Verizon-caused outages and security breaches. Unfortunately, the parties were not able to make such a comparison because, as Verizon admitted at the hearing in response to questioning from the Bench, its response to AG-VZ-1-1 does not include *all* security breaches in Massachusetts central offices. Tr. 397 ("if a Verizon - Massachusetts central-office technician damaged Verizon equipment, it would not be" in Verizon's response to AG-VZ-1-1 (Jacobs)).⁷ In light of Verizon's narrow interpretation and selective production of documents concerning security breaches at its central offices, it would be reasonable for the Department to infer that a comparison of (a) the unproduced documents regarding Verizon-caused outages and security breaches in Verizon-secured space to (b) the security violations produced by Verizon, would result in a finding that CLEC technicians are *less*

⁷ In AG-VZ-1-3, Verizon was asked to produce documents relating to "such violations as theft and vandalism of Verizon equipment in secured and unsecured areas of the central office." Verizon referred to its response to AG-VZ-1-1. At the hearing, both Verizon witness Jacobs and Verizon witness Reney agreed that "the responses to AG-VZ-1-1 would be inclusive" of all such violations, and "not specific to CLECs or collocation." Tr. 399.

likely to engage in intentional or unintentional security breaches than Verizon's own technicians.⁸

V. Verizon's "logical" argument that a reduction in "foot traffic" will improve security is fallacious

Recognizing the dearth of evidence supporting its proposals, Verizon asserted at the hearing that "the basic principle that limiting access reduces the risk, the principle is basically a logical – based on logic." Tr. 41 (Craft). The "logic" is that a reduction in CLEC foot traffic will necessarily result in a reduction of network-affecting incidents arising from either intentional or unintentional conduct. Having invoked logic to justify the "basic principle" that limiting access – and more particularly limiting CLEC access – reduces risk, Verizon's proposal, when reduced to a syllogism (as in "every virtue is laudable; kindness is a virtue; therefore kindness is laudable") would be "foot traffic increases the risk of adverse network affecting events; CLEC technicians cause foot traffic; therefore, CLEC technicians increase the risk of adverse network-affecting events." But Verizon's "basic premise" is wrong. "Foot traffic" does not increase the risk of harm to the network; having incompetent technicians or technicians with malevolent intent on site increases the risk of harm to the network. And Verizon has not proven that CLEC technicians are more likely to fall into either of these categories.

⁸ Although the suggested inference to be drawn from Verizon's evidentiary omission stands on its own, it is also worth noting that Ms. Ehrenberg, counsel for the unions representing approximately 11,000 Verizon employees in Massachusetts, raised a "point of clarification" at the hearing concerning the use of the term "perpetrator." Specifically, Ms. Ehrenberg explained that "it happens *with some frequency* that that determination [*i.e.*, Verizon's identification of a union employee as a "perpetrator"] is challenged" by the unions. Tr. 657-58 (emphasis added). This suggests that there is, in fact, an ample body of documentary evidence that Verizon chose not to share with the Department and the parties concerning security breaches involving Verizon's own personnel.

The two broad categories of conduct that Verizon seeks to reduce or eliminate are “unintentional” and “intentional” acts that disrupt its network. Tr. 111. Verizon admitted that there is no evidence in the record to suggest that Verizon technicians are less likely than their CLEC counterparts to make mistakes (*i.e.*, engage in *unintentional* conduct). Tr. 113 (“There's no factual analysis, studies, or reports. No, there's not.”). Verizon also admitted that even if its proposal to convert physical collocations to virtual collocations in “critical” central offices were adopted, the actual amount of work to be done (*i.e.*, the opportunities for a technician to work on the wrong equipment, cut the wrong wire or otherwise engage in network-affecting *unintentional* conduct) would not change. Tr. 117. Thus, eliminating CLEC technicians would not reduce the opportunity for mistakes to be made, nor would it result in more competent technicians remaining behind.

With respect to *intentional* conduct adversely affecting Verizon’s network, Verizon again has provided no evidence to suggest that CLEC technicians have a greater propensity to engage in terrorism or other criminal conduct than Verizon technicians. Indeed, with respect to the Massachusetts incidents contained in the Summary Reports provided in response to Exh. AG-VZ-1-1, Verizon “has identified no responsible parties” (RR-DTE-VZ 2), and so banning CLEC personnel from central offices could in fact result in an *increase* in criminal conduct if the presence of CLEC technicians working on their collocated equipment is a deterrent to individual employees of Verizon that might otherwise engage in criminal conduct in or near CLEC collocation cages. The evidence also shows that WorldCom already conducts background investigations (including checking employment history, education, criminal and

motor vehicle records and drug testing) before hiring new employees. Exh. WCOM-1 (Lathrop Reb.) at 13. Thus, steps are already being taken to identify potentially bad apples.

The bottom line is that Verizon has no proof that their technicians are any more competent than CLEC technicians, and no proof that CLEC technicians are any more likely to be saboteurs than their technicians. There is thus no way to “logically” conclude that Verizon’s proposal is going to make one whit of difference when it comes to making Verizon’s network any more secure than it is today.

VI. The Department should monitor Verizon’s implementation of security measures

Verizon has acknowledged that it is already engaging in “efforts to replace old systems to improve the security at locations.” Tr. 237 (Craft). Verizon should be allowed to continue its ongoing efforts, to the extent they are consistent with current federal law and do not impose unreasonable costs or other burdens on CLECs. Inasmuch as the Department has sought to determine whether Verizon’s existing procedures are “unjust, unreasonable, unsafe, improper or inadequate” under G.L. c.159, §16, perhaps the way to ensure that Verizon’s efforts meet with the Department’s approval is for the Department to be periodically updated with respect to the status of those efforts.

VII. Conclusion

In considering collocation security issues previously, the Department has stated as follows:

Security of facilities ultimately protects the consuming public, and we must not lose sight of that principle. But security

concerns cannot be a reflexively accepted excuse for encumbering and impeding competitors, in whose commercial success the public also has some interest.

D.T.E. 98-57-Phase 1, *Order on Motions for Reconsideration*, at 16 (September 7, 2000). Even in a post-September 11 world, those words still hold true. Verizon's proposals bank on the Department retreating from those words, and for that reason alone Verizon's proposals must be rejected.

For all the foregoing reasons, WorldCom respectfully requests the Department to: (1) reject Verizon's proposals as both unnecessary and anticompetitive; (2) decline Verizon's invitation to change existing collocation policies in Massachusetts, and similarly decline to seek changes to the current collocation rules promulgated by the Federal Communications Commission pursuant to the Telecommunications Act of 1996, and; (3) monitor Verizon's ongoing efforts to bring its current security measures more up-to-date.

Respectfully submitted,

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Dated: New York, New York
August 9, 2002

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing upon each person designated on the attached service list by email and either U.S. mail or overnight courier.

Dated: New York, New York
August 9, 2002
